

# Service Associates, Inc.

807 Burke Street  
Winston-Salem, North Carolina 27101  
828.668.5113 – 336.793.9105 FAX

March 23, 2017

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**CC Docket No. 02-6**  
**CC Docket No. 96-45**

**Re: Review and Waiver Request**

To whom it may concern:

**On behalf of Spartanburg County School District 2, I am requesting that the FCC Waive the deadline for requesting an "Invoice Deadline Extension" so Spartanburg School District 2 can 1) file a one-time deadline extension request and 2) retrieve eligible reimbursements (in excess of \$800,000.00) – funding which the District was eligible for, and successfully applied for, before their E-Rate Support staff suffered a sudden, rapid and critical decline in health.**

**My letter of agency is attached. My contact information is as follows:**

Heather Hosey, Senior Compliance Analyst  
Service Associates, Inc.  
807 Burke Street  
Winston-Salem, NC 27101  
[hhosey@serviceassoc.com](mailto:hhosey@serviceassoc.com)  
828.668.5113  
336.793.9105 FAX

**Applicant** Troy Moore, Technology Director  
**Contact:** Spartanburg County School District 2  
3231 Old Furnace Road  
Chesnee, SC 29323  
[spa2@serviceassoc.com](mailto:spa2@serviceassoc.com)  
864-578-0128

\*\*\*\*\*  
**Service Associates, Inc. is an E-rate support services company  
providing services exclusively to E-rate applicants.**  
\*\*\*\*\*

**Regarding:** Funding Commitment Decision Letter:  
Date of Letter July 17, 2015  
Applicant Spartanburg County School District 2  
Billed Entity Number 127155  
Form 471 Application Number 1029907  
Funding Request Numbers 2823117

The USAC guidance given in the March 14, 2017 "Case Thread" is:

"Invoice #2395811 was never certified by the service provider. You will need to file a new FCC Form 472 BEAR for the FRN. Applicants and Service Providers may request a single, one-time 120-day extension of the deadline to submit an invoice. This can be done using the Submit a Question tool on the Schools and Libraries website (SLD website) or the Invoice Deadline Extension Tool in the BEAR section of the invoicing system. The deadline for submitting an invoice extension request is 120 days after the last date to receive service or 120 days after the date of the FCC Form 486 Notification Letter, whichever is later. For IDERs that are not timely filed, the filer must first file a waiver request with the FCC and the FCC must grant the waiver request before USAC can extend the invoice deadline.

If you have any additional questions or concerns, please reopen the case and add a note. If the case cannot be reopened, you may create a new case or contact the Client Service Bureau at 888-203-8100."

### **Grounds for Waiver Request**

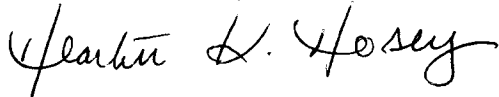
Spartanburg County School District 2 faces special circumstances warranting a deviation from the invoice deadline rules. The Applicant's previous E-Rate support staff experienced a rapid and sudden decline in her health, which turned critical, involving numerous surgeries and lengthy hospital stays. To date, the School District has not heard from this woman regarding an update on her health and/or employment and District staff fear the worst.

The Applicant received neither an inquiry nor a BEAR notification for this invoice and they had no idea the status of their request for reimbursement until my firm reached out to USAC on March 14, 2017. The District had no information regarding the status of their invoice, despite reaching out for assistance from their former E-Rate support staff and due to this lack of correspondence, they decided to pay in full the service provider invoice of over \$800,000.00 and they are anxious to claim their eligible reimbursement of these funds.

We understand USAC's fiduciary responsibility; however, punishing the students and staff of Spartanburg County School District 2 for E-Rate support staff negligence and sudden health issues seems unjust. It is my opinion, that the loss of such valuable E-Rate funding would be preposterous. On behalf of Spartanburg County School District 2, I ask that the FCC direct USAC to extend their invoicing deadline so the District may claim their eligible reimbursement in excess of \$800,000.00. To do otherwise, would contribute further to the inequity of the District.

We all thank you for your kind attention to this matter. Please contact me if you have any questions or need additional information.

Sincerely,  
Service Associates, Inc.

A handwritten signature in black ink, appearing to read "Heather D. Hosey". The signature is fluid and cursive, with the first name "Heather" being more prominent.

Heather Hosey, Senior Compliance Analyst

Attachment: Letter of Agency

Attachment: #161998 – BEAR Status – D2 Net Upgrade USAC Case Thread



## Spartanburg County School District Two

Administrative Offices

3231 Old Furnace Road • Chesnee, South Carolina 29323

Telephone: (864) 578-0128 • Fax: (864) 578-8924

[www.spartanburg2.k12.sc.us](http://www.spartanburg2.k12.sc.us)

March 14, 2017

Schools and Libraries Division  
Box 125 – Correspondence Unit  
80 South Jefferson Road  
Whippany, NJ 07981

To Whom It May Concern:

This letter is to inform you that Spartanburg School District Two (BEN 127155) has retained Service Associates, Incorporated to advise and assist the District in all matters regarding E-Rate and associated matters effective March 14, 2017 and we hereby authorize you to fully and openly speak and/or correspond with Service Associates, Inc. Compliance Analysts listed below regarding all matters before USAC-SLD and/or the FCC:

Oliver T. Frail  
Thomas T. Traywick  
Heather K. Hosey  
Jane J. Jones  
Jamie Tomlinson

Additionally, these analysts will serve as the District's Contact on all Forms and special purpose letters requested by the District.

This Letter of Agency will be in effect through December 31, 2018, unless canceled or extended by the District, and covers all District applications/forms for all types of services for any Funding Year.

Thank you for your assistance in this matter.

Sincerely,

Brock Heron, CSBO, Chief Finance Officer

cc: Oliver T. Frail, Senior Compliance Analyst, Service Associates, Inc.  
Troy Moore, Director of Technology, Spartanburg County School District Two



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Records / Customer Service Cases

#161998 - BEAR Status - D2 Net Upgrade

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Reopen Case

Case Details



Topic	FCC Form 472 - BEAR - Status Inquiry	Form Type	FCC Form 472
Status	Closed	Form Number	2395811
Priority	Medium	Created By	Oliver Frail
Inquiry Type	Web	Created On	3/14/2017 1:56 PM EDT
		Organization	SPARTANBURG COUNTY SCHOOL DISTRICT TWO

Case Description



**Description** Spartanburg County School District Two is requesting a status update for SLD BEAR invoice number 2395811. The applicant's previous consultant was transitioning towards retirement, pending the successful processing of the district's FY2015 eligible reimbursements, when her health declined rapidly becoming critical and involving numerous surgeries and hospital stays. The applicant has received neither an inquiry nor a BEAR notification for this invoice. Since the district's previous consultant is incapacitated the district has no information regarding the status of their invoice with the exception of the attached BEAR Status report, sent by their consultant on August 28th. The district has paid in full and is anxious to claim their eligible reimbursement of over \$800,000. On behalf of Spartanburg School District Two, I sincerely appreciate your assistance and support.

Best Regards,  
Oliver

Case Artifacts



Documents

Attachments

Name	Uploaded By	Upload Date	Attachment	Attachment Type
SPA2 FY2015 BEAR Status 2016.08.28	Oliver Frail	3/14/17 1:56 PM		No items available

Case Thread



User	Note	Date
	Oliver,	
USAC	As of July 1, 2016, service providers will no longer be involved in the BEAR certification and submission process. USAC will instead only reimburse applicants directly via electronic transfer. Previous to this date listed Service Providers still had to follow the certification process.  If you have any additional questions or concerns, please reopen the case and provide the information, create a new case, or contact CSB at 888-203-8100.	3/23/2017 10:23 AM EDT
Heather Hosey	You said in your description below that "invoice #2395811 was never certified by the service provider." is this what you meant to relay? I did not think electronic BEARS were certified by service providers? Or was it a typo?	3/23/2017 10:17 AM EDT
USAC	Oliver,  Invoice #2395811 was never certified by the service provider. You will need to file a new FCC Form 472 BEAR for the FRN. Applicants and Service Providers may request a single, one-time 120-day extension of the deadline to submit an invoice. This can be done using the Submit A Question on the Schools and Libraries website (SLD website) or the Invoice Deadline Extension Tool in the BEAR section of the invoicing system. The deadline for submitting an invoice extension request is 120 days after the last date to receive service or 120 days after the date of the FCC Form 486 Notification Letter, whichever is later. For IDERs that are not timely filed, the filer must first file a waiver request with the FCC and the FCC must grant the waiver request before USAC can extend the invoice deadline.  If you have any additional questions or concerns, please reopen the case and add a note. If the case cannot be reopened, you may create a new case or contact the Client Service Bureau at 888-203-8100.	3/14/2017 3:25 PM EDT

Case Contact

**Case Contact**   Oliver Frail